Application No.: 10/713,872
Request for Continued Examination dated: June 29, 2007
Reply to Office Action of March 29, 2007

<div align="center">**REMARKS/ARGUMENTS**</div>

Claims 1-16 are pending in the application. Claims 1-16 are rejected. Claims 1, 3, 6-9, 11, 13-14, and 16 have been cancelled. Claims 17-24 have been added. Claims 2, 4-5, 10, 12, and 15 have been amended in part to correct claim dependencies. No new matter has been added.

INFORMATION DISCLOSURE STATEMENT

Applicants respectfully submit herewith a legible copy of item #17 of the Non-Patent Literature portion of the information disclosure statement filed on March 5, 2007, which was previously not considered due to illegibility.

EXAMINER INTERVIEW SUMMARY

Applicants thank the Examiner for his time in conducting the Examiner's Interview on June 26, 2007. During the Examiner's Interview, the Examiner and Applicants' representative discussed a proposed claim amendment to pending independent claim 1. No claim amendment language, however, was agreed upon.

CLAIMS 1-4 AND 6-16 DEFINE OVER THE CITED ART

Claims 1-4 and 6-16 are rejected under 35 U.S.C. § 102(e) as being anticipated by Iyengar, U.S. Pat. No. 6,874,146 (hereinafter "Iyengar"). Previously pending independent claims 1, 7, 11, 14, and 16 have been rewritten as new independent claims 17-21. Applicants respectfully traverse this rejection, and submit that each pending claim is patentably distinguishable over <u>Iyengar</u>.

In order for a claim to be anticipated under 35 U.S.C. § 102, the reference must disclose, either expressly or inherently, each and every element as set forth in the claim. MPEP § 2131.

Application No.: 10/713,872
Request for Continued Examination dated: June 29, 2007
Reply to Office Action of March 29, 2007

Such anticipation does not occur in the instant application, however, because <u>Iyengar</u> fails to disclose each and every element as set forth in the pending claims.

Independent claim 17 recites in part:

in a multi-layer modeling architecture, *responsive to the application framework extensions, dynamically modeling an application object repository framework* in a first layer using repository constructs and semantics defined by a repository framework model in a second layer, wherein the repository framework model is defined by a common modeling language in a third layer that also models the application framework in the second layer, wherein the application framework supports the application by providing application constructs and semantics to structure and provide functionality for the application, and wherein the application framework extensions provide additional functionality to the application framework;

generating an application object repository from the application object repository source files, which comprises:

generating an application object repository schema from the database schema script, the application object repository schema defining a relational database structure for storing application metadata representing the application framework extensions; and

compiling the runtime source file to generate an executable component, the executable component providing at least one database service for object-oriented interaction with the stored application metadata in the application object repository.

Independent claims 18-21 include similar recitations.

While Iyengar discloses a multi-layer modeling architecture, Iyengar does not expressly or inherently disclose *dynamically modeling an application object repository framework* in response to a change in an application framework, as generally recited in independent claims 18-21. Additionally, Iyengar does not disclose dynamically modeling an application object repository framework *in response to application framework extensions*, as claimed. To facilitate application development within an application framework or additional application

Application No.: 10/713,872
Request for Continued Examination dated: June 29, 2007
Reply to Office Action of March 29, 2007

framework functionality using objects stored in the application object repository, the presently

claimed invention re-models and re-generates the object repository framework for each change

or extension added to the application framework. Iyengar fails to disclose this dynamic

modeling of a repository framework in response to changes to a corresponding application

framework. Iyengar merely discloses creating XML Document Type Definitions (DTDs) and

using XMI to transfer the metadata describing these models between MOF repositories. *See,*

generally, Iyengar, Col. 10, lines 39-50. While DTDs may be used to create UML- or MOF-

compliant models, Iyengar lacks any disclosure of an impetus for re-modeling and re-generating

already existing UML- or MOF-compliant models, much less that such re-modeling and re-

generating is performed due to a change in a related application framework. Without this

showing, Iyengar simply does not anticipate the pending claims.

The Office Action contends that the Iyengar discloses the claimed "generating an

application object repository" element. Iyengar, Col. 9, line 45 to Col. 10, line 2. The cited

description fails to disclose generating any kind of repository, much less one including the steps

of generating an application object repository schema from a database schema script and

compiling the runtime source file. The cited portion merely states that MOF-based metadata

may *describe* various CORBA and non-CORBA related applications, such as metadata

repositories and tools. *See* Iyengar, Col. 9, lines 45-60. Iyengar, however, does not expressly or

inherently disclose that the MOF-based metadata is used to *generate* a repository schema or is

transformed into a runtime source file and *compiled* to generate an executable component.

Additionally, Iyengar fails to disclose the repository schema storing application metadata

representing application framework extensions or application development objects. Absent the

Application No.: 10/713,872
Request for Continued Examination dated: June 29, 2007
Reply to Office Action of March 29, 2007

disclosure of these steps to generate an application object repository, Iyengar does not anticipate the pending claims.

Note that Iyengar states its purpose is not to generate repositories from metadata, but to employ "XML Metadata Interchange for stream-based interchange of metadata." Iyengar, Col. 3, lines 12-15. Further stated objectives also are consistent with this purpose, and include supporting the interchange of any kind of metadata that can be expressed using the MOF specification, as well as interchanging metadata for any MOF metamodel. *See* Iyengar, Col. 3, lines 5-27; Col. 6, lines 49-52; and Col. 10, lines 39-41. Based on the portions cited in the Office Action and the disclosure as a whole, it is undoubtedly clear Iyengar is directed to ***moving*** metadata ***to and from existing*** modeling tools and repositories, ***not with generating new repositories*** from metadata as claimed in the present invention.

With respect to claims 18 and 19, Iyengar fails to disclose the "transforming application object repository metadata into application object repository source files" uses a predefined XSL transformation template to effect the transformation. While Iyengar does mention using XSL to create XML documents, XML documents are not source files. Iyengar, Col. 3, lines 45-52. XML is a markup language combining text and information about the text. Further, Iyengar fails to disclose generating the application object repository schema from a database schema script using object-oriented SQL. Accordingly, for at least these reasons as well, Iyengar does not anticipate independent claims 18 and 19, and by their dependency, claims 10 and 12.

Accordingly, for at least these reasons, Iyengar cannot anticipate independent claims 17-21 under 35 U.S.C. § 102(e). Furthermore, as each of dependent claims 2, 4-5, 10, 12, and 15 depend from and further limit independent claims 17-20, respectively, Applicants respectfully

Application No.: 10/713,872
Request for Continued Examination dated: June 29, 2007
Reply to Office Action of March 29, 2007

submit that for at least the same reasons as above claims 2, 4-5, 10, 12, and 15 also cannot be anticipated by Iyengar under 35 U.S.C. § 102(e).

CLAIM 5 IS NOT OBVIOUS OVER THE CITED ART

Claim 5 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Iyengar, U.S. Pat. No. 6,874,146.

The Office Action rejected previously presented claim 5 under 35 U.S.C. 103(a) as being unpatentable over Iyengar. Applicants respectfully submit that the Office Action does not establish a *prima facie* case of obviousness, because the suggestions or motivations provided by the Office do not cure the deficiencies of Iyengar (the 35 U.S.C. § 102 art) as explained above.

Accordingly, Applicants submit that all of the pending claims, independent and dependent, are non-obvious over Iyengar under 35 U.S.C. § 103(a).

Request for Allowance

It is believed that this Amendment places the application in condition for allowance, and early favorable consideration of this Amendment is earnestly solicited.

If, in the opinion of the Examiner, an interview would expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below.

Application No.: 10/713,872
Request for Continued Examination dated: June 29, 2007
Reply to Office Action of March 29, 2007

The Office is hereby authorized to charge any fees, or credit any overpayments, to

Deposit Account No. **11-0600**.

Respectfully submitted,
KENYON & KENYON LLP

Dated: June 29, 2007   By: /Mark D. Yuan/
                                             Mark D. Yuan
                                             (Reg. No. 57,312)

KENYON & KENYON LLP
333 West San Carlos St., Suite 600
San Jose, CA 95110
Telephone: (408) 975-7500
Facsimile: (408) 975-7501